

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SZY Holdings, LLC, *et al.*
Plaintiffs,

v.

IPF Sourcing LLC, *et al.*,
Defendants.

Civil Action No. 1:20-cv-01475 (LO/JFA)

NOTICE OF WAIVER OF ORAL ARGUMENT

Please take notice that, pursuant to Local Rule of Civil Procedure 7(E), Olaoluwaposi O. Oshinowo, Spencer C. Brooks, and Wiley Rein LLP (together, “Wiley Rein”), respectfully waive oral argument in connection with their Motion to Withdraw as Counsel for Defendants Rico Garcia and Hamsa Holdings, LLC (together, the “Defendants”) (the “Motion to Withdraw”) [Dkt. Nos. 64 & 65]. Wiley Rein has contacted counsel for Plaintiffs and Defendant IPF Sourcing LLC regarding agreement to submit the Motion to Withdraw without a hearing, but counsel indicate that they have not yet been able to discuss with their clients or have not heard from their clients regarding their consent to proceed without a hearing. In light of the fact that Defendants discharged Wiley Rein from representation in this matter and withdrawal therefore is mandatory, Wiley Rein respectfully requests that the Court grant the Motion to Withdraw without the need for a hearing.

Dated: May 20, 2022

Respectfully submitted,

By: /s/ Olaoluwaposi O. Oshinowo

Olaoluwaposi O. Oshinowo (Bar No. 84992)

Spencer C. Brooks (admitted *pro hac vice*)

Wiley Rein LLP

2050 M Street NW

Washington, DC 20036

ooshinowo@wiley.law

sbrooks@wiley.law

(Tel) (202) 719-7000

(Fax) (202) 719-4275

Counsel for Defendants Rico Garcia and Hamsa Holdings, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May, 2022, a true and exact copy of the foregoing was electronically filed with the Clerk of the District Court using the CM/ECF system and served electronically upon all counsel of record:

Robert C. Gill
Saul Ewing Arnstein & Lehr LLP
1919 Pennsylvania Avenue NW Suite 550
Washington, DC 20006
Tel. 202-333-8800
Fax. 202-295-6705
Email: Robert.gill@saull.com

Counsel for Plaintiffs SZY Holdings, LLC and FarFromBoringPromotions.com, LLC

John Anthony Bonello
David Brody & Dondershine, LLP
2100 Reston Parkway Suite 370
Reston, VA 20191
Tel. (703) 264-2220
Fax. (703) 264-2226
Email: jbbonello@dbd-law.com

Counsel for Defendant IPF Sourcing LLC

By: /s/ Olaoluwaposi O. Oshinowo
Olaoluwaposi O. Oshinowo (Bar No. 84992)
Wiley Rein LLP

Counsel for Defendants Rico Garcia and Hamsa Holdings, LLC